

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

SECOND SET OF INFORMATION REQUESTS OF
THE MEMBERS OF THE NE DG COALITION TO
NSTAR ELECTRIC, D.T.E. 03-121

Pursuant to 220 C.M.R. 1.06(6)(c), the Members of the NE DG Coalition ("NE DG Coalition") hereby submit to NSTAR the following information requests - NEDGC- 20.

Instructions

The following instructions apply to this set of information requests and all subsequent information requests issued by the NE DG Coalition to Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company in this proceeding.

1. "NSTAR Electric" or "Companies" means Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company, their officers, directors, employees, consultants, and attorneys.
2. "Company" means each of Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company and their respective officers, directors, employees, consultants and attorneys. Where a request is directed to "the Company" or "each of the Companies" provide a separate response for each Company.
3. "Department" means the Department of Telecommunications and Energy.
4. "Proposed Rates" means the rates proposed by the Companies in this proceeding: Boston Edison Company, Rates SB-1 and SB-2; Cambridge Electric Light Company, Rates SB-1, MS-1, SS-1, SB-2 and SB-3; and Commonwealth Electric Company, Rates SB-1 and SB-2.
5. "Applicable Rate Schedule" means the Applicable Rate Schedule referred to in each of the Proposed Rates.
6. "Distributed Generation" or "DG" has the meaning ascribed to it in G.L. c. 164, §1.
7. "Last General Rate Case" means, for each Applicable Rate Schedule, the last Department proceeding in which the Company submitted a cost of service study in support of the Applicable Rate Schedule.
8. "Companies' Filing" or "Filing" means all the documents NSTAR Electric filed in this proceeding.

Second Set of NE DG Coalition Information Requests

9. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
10. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
11. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
12. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.
13. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
14. If the Company finds that any of these requests is ambiguous, please notify the NE DG Coalition counsel so that the requests can be clarified prior to the preparation of a written response.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

SECOND SET OF INFORMATION REQUESTS OF
THE MEMBERS OF THE NE DG COALITION TO
NSTAR ELECTRIC, D.T.E. 03-121

Pursuant to 220 C.M.R. § 1.06(6)(c), the Members of the NE DG Coalition ("NE DG Coalition") hereby submit to NSTAR Electric the following information requests with respect to the above captioned matter.

- NEDGC-2-1 Provide copies of all correspondence between the Company and customers who installed, or were at the time of such correspondence considering installing distributed generation within the NSTAR service territories. We would not object to redactions of customer names, addresses or other information specifically indentifying the customer.
- NEDGC-2-2 Please explain any and all reasons beyond those stated in NSTAR testimony why NSTAR believes "it is now necessary to revisit the rate design previously adopted by the Department [in the Cambridge/MIT case, D.P.U. 94-101/95-36] in order to establish Standby Rates that will meet the Department's policy goals for Standby Rates for DG customers, and to reflect the newly restructured electric industry in Massachusetts." *LaMontagne Testimony at p.11 Lines 6 - 9.*
- NEDGC-2-3 Provide complete and detailed documentation for the statement that "in this circumstance, Transmission and Distribution system ("T&D") cost causation is based on how the T&D is actually planned and maintained for customers who self generate. *LaMontagne Testimony at p. 12-13*
- NEDGC-2-4 Provide complete and detailed documentation regarding the incorporation of DG into the distribution system planning process, including inter alia, any studies, internal memoranda or financial modeling that references actual or potential incorporation of DG into (1) the distribution planning process or (2) demand side management programs.
- NEDGC-2-5 Please explain how the "cost-causation complication" referred to in Mr. LaMontagne's testimony on page 16 actually relates to cost causation, rather than the potential for under-recovery of costs.
- NEDGC-2-6 Provide complete and detailed documentation for the statement that "the costs attributable to providing distribution service to the standby customer are predominantly fixed, unavoidable and the same as those incurred by a comparable all-requirements customer." *LaMontagne Testimony at 18.*
- NEDGC-2-7 Provide complete and detailed documentation supporting the decision to convert

D.T.E. 03-121
Second Set of NE DG Coalition Information Requests

distribution rates elements that included an energy component into a fixed demand charge.

- NEDGC-2-8 In reference to Mr. LaMontagne's statement on lines 14-15 of page 24, what, if any, other means did Company consider to avoid double collection of distribution revenues, other than converting energy use charges to contract demand based charges for the rates discussed?
- NEDGC-2-9 Provide the kWh and kW "billing determinants" that served as the basis for the development of the single demand charges for Rate SB-2 for Boston Edison, as well as for the other rates where such conversion from energy to demand charges were made as described on pages 23 and 24 of Mr. LaMontagne's testimony, including, the number of kWh used to determine the energy based revenue amount shown on Exhibits NSTAR-HCL-2, NSTAR HCL-3 and NSTAR HCL-4.
- NEDGC-2-10 For each of the Applicable Rate Schedules during the period 2000-2003; provide number of customers in each class whose monthly maximum demand as measured in kW varied between their lowest month and highest month by more than (1) 25%, (2) 50% or (3) 75% or (4) 100%. For example, if a customer's lowest monthly maximum demand was 100 kW in April, and their highest demand monthly maximum was 185 kW in August, then they would be listed under group 3.
- NEDGC-2-11 Please provide complete and detailed information supporting the statement that "Because the Company would not plan for or build distribution and transmission facilities to serve interruptible customers, the customer would be billed a customer charge only and then billed on as "as-used" basis under the otherwise applicable tariff for any service actually taken." *LaMontagne Testimony* at 26, lines 21-24
- NEDGC-2-12 In reference to the quote in the prior question NEDGC 2-11, please explain how NSTAR decided that a customer who seeks "interruptible" service and causes the Company to incur no costs should be nonetheless charged the exact same rates as an all requirements customer?
- NEDGC-2-13 Please provide copies of all applicable tariffs, rates, agreements, or contracts under the terms of which the Company currently provides, or in the past five years, provided so-called interruptible service.
- NEDGC-2-14 Provide complete and detailed documentation regarding the level of reserve distribution capacity – e.g. distribution capacity over and above projected system peak load -- that is typically incorporated into the distribution system planning process for each distribution voltage level, including substation, primary and secondary distribution.

Second Set of NE DG Coalition Information Requests

- NEDGC-2-15 Please provide complete and detailed documentation regarding portions of the distribution systems in the Company's service territories that are operating at below the recommended reserve margins during peak load periods for each distribution voltage level, including substation, primary and secondary distribution.
- NEDGC-2-16 Provide complete and detailed documentation showing how the Company recovers costs incurred from firm all-requirements customers who reduce their electricity consumption as a result of installing equipment or instituting other energy conservation measures.
- NEDGC-2-17 Provide complete and detailed documentation showing how the Company recovers costs from firm all-requirements customers who reduce their electricity consumption due to any circumstance other than those listed in the prior question NEDGC 2-17.
- NEDGC-2-18 Provide, for each Company, the monthly number of customers for each Applicable Rate Schedule for the years 1998-2003.
- NEDGC-2-19 Provide, for each Company, the monthly number of customers for each Proposed Rate for the years 1998-2003.
- NEDGC-2-20 Provide, for each Company, the total (line and iron) peak losses as a percent of peak for the years 1993-2003 for each of the following:
- (a) transmission lines
 - (b) distribution substations
 - (c) primary distribution lines
 - (d) secondary distribution lines.
- NEDGC-2-21 Provide, for each Applicable Rate Schedule, all marginal cost studies relating to the Applicable Rate Schedule submitted to the Department by the Company, dating back to and including the Last General Rate Case.
- NEDGC-2-22 Provide, for each Applicable Rate Schedule, the Company's best estimate of the number of hours during the year in which the peak demand is likely to occur at each of the following levels:
- (a) transmission
 - (b) distribution substations

D.T.E. 03-121
Second Set of NE DG Coalition Information Requests

(c) primary distribution

(d) secondary distribution.

NEDGC-2-23 (a) For the dollar amounts of distribution investment provided in response to Information Request NEDGC 1-11, identify for each account, year and voltage level, the dollar amounts of new investment related to major system renovations.

(b) Additionally, provide the response to part (a) in test year dollars, using the test year from the cost of service study submitted to the Department in the Company's Last General Rate Case. For example, if the test year of the cost of service study was 1997, provide the response to part (a) in 1997 dollars. Provide complete and detailed documentation for the conversion of the dollar amounts provided in response to part (a) to test year dollars.

NEDGC-2-24 Provide the response to NEDGC 1-11 in test year dollars, using the test year from the cost of service study submitted to the Department in the Company's Last General Rate Case. For example, if the test year of the cost of service study was 1997, provide the response to NEDGC 1-11 in 1997 dollars. Provide complete and detailed documentation for the conversion of the dollar amounts provided in response to NEDGC 1-11 to test year dollars.

NEDGC-2-25 Provide the response to NEDGC 1-12 in test year dollars, using the test year from the cost of service study submitted to the Department in the Company's Last General Rate Case. For example, if the test year of the cost of service study was 1997, provide the response to NEDGC 1-12 in 1997 dollars. Provide complete and detailed documentation for the conversion of the dollar amounts provided in response to NEDGC 1-12 to test year dollars.

Q:\rmf\Standby Rates\second info requests.doc